

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

MICHAEL AMOS, *et al.*

PLAINTIFFS

VS.

CIVIL ACTION NO. 4:20-CV-07-DMB-JMV

TOMMY TAYLOR, *et al.*

DEFENDANTS

DEFENDANTS' MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL

Defendants file this Motion seeking leave from the Court to file Plaintiffs' medical records with the Court under seal, and in support of this Motion, Defendants state as follows:

1. Defendants have this day filed their Response in Opposition [Doc. 118] to Plaintiffs' Supplemental Emergency Motion for Temporary Restraining Order and Preliminary Injunction [Doc. 98 and 99]. Defendants intend to file relevant portions of Plaintiffs' medical records as Exhibit 8 to their Response in Opposition.

2. In order to protect Plaintiffs' confidentiality and privacy, Defendants request that the Court permit them to file Exhibit 8 to their Response in Opposition, which is a compilation of Plaintiffs' relevant medical records, under seal. Defendants request that the Court receive and docket said Exhibit 8 under seal.

3. Defendants have conferred with Plaintiffs' counsel to obtain their consent to this Motion, but as of the time of filing this Motion, Plaintiffs have not consented.

4. Due to the nature of this Motion, Defendants request that the Court waive the requirement of Uniform Local Rule 7(b)(4) for a separate memorandum of authorities to be submitted with this Motion.

ACCORDINGLY, Defendants respectfully request that the Court enter an order allowing the Defendants to file the aforementioned Exhibit 8 under seal. Defendants request such other and further relief as the Court deems just and appropriate under the circumstances.

Date: July 13, 2020.

Respectfully submitted,
**TOMMY TAYLOR, in his official capacity as
the Interim Commissioner of the Mississippi
Department of Corrections, and MARSHAL
TURNER, in his official capacity as the
Superintendent of the Mississippi State
Penitentiary**

By: /s/ Cody C. Bailey
Cody C. Bailey, MSB #103718
One of Defendants' Attorneys

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CERTIFICATE OF SERVICE

I, Cody C. Bailey, hereby certify that on July 13, 2020, I caused the foregoing pleading to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record and registered participants.

/s/ Cody C. Bailey
One of the Attorneys for the Defendants